

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CAROLYN PLACHT, on behalf of the Symbria
Inc. Employee Stock Ownership Plan and on
behalf of a class of all other persons similarly-
situated,

Plaintiff,

v.

ARGENT TRUST COMPANY, *et al.*,

Defendants.

No.: 21-cv-05783

Honorable Ronald A. Guzman

Magistrate Judge Beth W. Jantz

**DEFENDANT JOHN CALLEN’S MOTION FOR EXTENSION OF TIME
TO FILE A RESPONSIVE PLEADING**

Defendant John Callen (“Callen”), by and through his undersigned counsel, respectfully submits this Motion for an Extension of Time to File a Responsive Pleading to January 31, 2022.

In support of his Motion, Defendant Callen states as follows:

1. Defendant Callen was served with a copy of Plaintiff’s Complaint on November 16, 2021, placing the current deadline for Defendant’s responsive pleading on December 7, 2021.
2. Callen has only just engaged counsel to represent him in this matter.
3. There is good cause to extend the date by which Callen is to respond to the Complaint. Callen and his counsel require additional time to fully assess the facts and allegations in Plaintiff’s 137-paragraph Complaint, as well as to prepare a responsive pleading. Moreover, Defendant Callen is occupied by a serious personal matter, necessitating additional time on his behalf.
4. This extension of time will not prejudice or harm Plaintiff, who does not oppose the extension of time requested herein.
5. This is Defendant Callen’s first request for an extension of time in this matter.

6. Defendant Callen does not seek any other extensions of time for other deadlines entered in this case, including the deadline by which the parties shall hold a joint initial status conference and file an initial joint status report. (*See* Dkt. 7.)

7. The request is made in good faith and not for purposes of delay.

WHEREFORE, for all the reasons set forth herein, Defendant John Callen respectfully requests this Court extend the time by which Callen may file a responsive pleading to the Complaint to and including January 31, 2022.

Dated: December 6, 2021

Respectfully submitted,

JOHN CALLEN

BY: /s/ Michael J. Scotti, III

Michael Scotti, III
Roetzel & Andress LPA
30 N. LaSalle Street, Suite 2800
Chicago, IL 60602
msscotti@ralaw.com

Attorneys for Defendant John Callen

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on December 6, 2021, he caused the foregoing motion to be electronically filed using the Court's CM/ECF system, which send notification of such filing to all registered participants.

/s/ Michael J. Scotti

Michael J. Scotti, III